

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**DEQUE SYSTEMS INC.**

**Plaintiff,**

**v.**

**BROWSERSTACK, INC., and  
BROWSERSTACK LIMITED, and  
BROWSERSTACK SOFTWARE PVT.  
LTD.,**

**Case No. 1:24-cv-00217-AJT-WEF**

**Defendants.**

**DEFENDANT BROWSERSTACK, INC.'S MOTION TO DISMISS  
PURSUANT TO RULE 12(B)(6)**

Defendant BrowserStack, Inc. (“Defendant” or “BrowserStack U.S.”), by counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, respectfully moves to dismiss the Complaint [ECF No. 1] filed by Plaintiff Deque Systems Inc. (“Deque” or “Plaintiff”) in its entirety due to Plaintiff’s failure to state a claim for which relief can be granted. The grounds for this motion are fully detailed in the Memorandum in Support that is filed contemporaneously herewith.

WHEREFORE, BrowserStack, Inc. respectfully requests that the Court grant this motion and dismiss Plaintiff’s Complaint with prejudice.

Dated: April 8, 2024.

Respectfully submitted,

/s/ Belinda D. Jones

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/s/ Ryan J. Marton

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*Attorneys for Defendant BrowserStack, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on April 8, 2024, I filed a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Belinda D. Jones  
Counsel

*Attorneys for Defendant BrowserStack, Inc.*